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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**DECLARATION OF ANNE K. DAVIS IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO FACEBOOK'S
ADMINISTRATIVE MOTION TO
ADDRESS NEW REQUESTS FOR
PRODUCTION OF FINANCIAL
DOCUMENTS**

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

I, Anne K. Davis, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am a partner at the law firm of Bleichmar Fonti & Auld LLP, a member in good standing of the bar of the State of California and of this Court, and counsel to Plaintiffs in the above-captioned action.

2. This declaration is made upon personal knowledge in support of Plaintiffs' Opposition to Facebook's Administrative Motion to Address New Requests for Production of Financial Documents.

3. On February 14, 2022, the parties participated in a discovery mediation session in which Facebook agreed to search for and produce specific categories of financial documents requested by Plaintiffs.

4. On February 25, 2022, Plaintiffs sent a letter to Facebook memorializing the categories of documents identified during the discovery mediation session, including documents regarding the financial impact of, among other things, "deprecating friends and read permissions, and the impact of whitelisting apps and partners," "limiting . . . access to user data," and "third parties accessing or using FB user content and information that violate FB platform policies." Attached as **Exhibit A** is a true and correct copy of Plaintiffs' February 25, 2022 Letter.

5. On May 26, 2022, Plaintiffs sent a letter to Facebook again requesting production of the financial information identified in February 2022, and specifically seeking information "showing the revenue Facebook received from all third parties whose access to data was limited as part of the ADI process" and "documents reflecting revenues associated with third parties who were whitelisted." Attached as **Exhibit B** is a true and correct copy of Plaintiffs' May 26, 2022 Letter.

6. On June 14, 2022, Facebook sent a letter stating its view that the requests it labels as new in the Administrative Motion are actually "already adequately covered" by other collections it is undertaking to review and produce. Facebook demanded that Plaintiffs explain why the ADI request was not "covered by Facebook's ongoing search for, and production of, ADI-related

materials.” Facebook also claimed that “documents relating to Facebook’s analysis of the revenue impacts of ‘any changes’ implemented after Cambridge Analytica’s activities” would be “fully covered by Facebook’s prior document production, which used several Cambridge Analytica-related search strings to identify potentially responsive documents.” Attached as **Exhibit C** is a true and correct copy of Facebook’s June 14, 2022 Letter.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 5th day of July 2022, in Pacifica, California.

By: /s/ Anne K. Davis
Anne K. Davis